

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

MICROSOFT CORPORATION

v.

PAK ET AL.

Case No. 1:15-cv-01634-DAP

DEFENDANTS' ANSWER

Defendants Julianna Pak and Mark Pak ("Defendants"), through undersigned counsel, hereby respond to Microsoft Corporation ("Plaintiff") as follows:

THE PARTIES

1. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations. To the extent a response is required, the statements of that paragraph are denied.
2. Admit that the website exists, denied as to the remaining allegations.
3. Denied.
4. Denied.
5. Denied.

JURISDICTION

6. The allegations of this paragraph are conclusions of law to which no response is required. To the extent a response is required, the statements of that paragraph are denied.
7. The allegations of this paragraph are conclusions of law to which no response is required. To the extent a response is required, the statements of that paragraph are denied.

VENUE

8. The allegations of this paragraph are conclusions of law to which no response is required. To the extent a response is required, the statements of that paragraph are denied.

FACTS COMMON TO ALL CLAIMS

9. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations. To the extent a response is required, the statements of that paragraph are denied.

10. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations. To the extent a response is required, the statements of that paragraph, and all of its subparts, are denied.

11. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations. To the extent a response is required, the statements of that paragraph are denied.

12. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations. To the extent a response is required, the statements of that paragraph, and all of its subparts, are denied.

DEFENDANTS' INFRINGEMENT

13. Denied.

14. Denied.

15. Denied.

16. Denied.

17. Denied.

18. Denied.

19. Denied.

20. Denied.

FIRST CLAIM

21. Denied.

22. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations. To the extent a response is required, the statements of that paragraph are denied.

23. Denied.

24. Denied.

25. Denied.

26. Denied.

27. The allegations of this paragraph are conclusions of law to which no response is required. To the extent a response is required, the statements of that paragraph are denied.

28. The allegations of this paragraph are conclusions of law to which no response is required. To the extent a response is required, the statements of that paragraph are denied.

29. The allegations of this paragraph are conclusions of law to which no response is required. To the extent a response is required, the statements of that paragraph are denied.

SECOND CLAIM

30. Denied.

31. Denied.

32. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations. To the extent a response is required, the statements of that paragraph are denied.

33. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations. To the extent a response is required, the statements of that paragraph are denied.

34. Denied.

35. Denied.

36. Denied.

37. Denied.

38. Denied.

39. Denied.

40. The allegations of this paragraph are conclusions of law to which no response is required. To the extent a response is required, the statements of that paragraph are denied.

41. The allegations of this paragraph are conclusions of law to which no response is required. To the extent a response is required, the statements of that paragraph are denied.

42. The allegations of this paragraph are conclusions of law to which no response is required. To the extent a response is required, the statements of that paragraph are denied.

THIRD CLAIM

43. Denied.

44. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations. To the extent a response is required, the statements of that paragraph are denied.

45. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations. To the extent a response is required, the statements of that paragraph are denied.

46. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations. To the extent a response is required, the statements of that paragraph are denied.

47. Denied.

48. Denied.

49. Denied.

50. Denied.

FOURTH CLAIM

51. Denied.

52. Denied.

53. Denied.

54. Denied.

FIFTH CLAIM

55. Denied.

56. Denied.

57. Denied.

58. Denied.

59. Denied.

SIXTH CLAIM

60. Denied.

61. The allegations of this paragraph are conclusions of law to which no response is required. To the extent a response is required, the statements of that paragraph are denied.

62. The allegations of this paragraph are conclusions of law to which no response is required. To the extent a response is required, the statements of that paragraph are denied.

63. Denied.

Respectfully submitted,

/s/Eric J. Menhart*

Eric Menhart, Esq.

Lexero Law

316 F St. NE, Suite 101

Washington, DC 20002

Phone: 855-4-LEXERO (855-453-9376) Ext. 101

Fax: 855-4-LEXERO (855-453-9376)

Eric.Menhart@Lexero.com

* Pending Admission *Pro Hac Vice*

CERTIFICATE OF SERVICE

I hereby certify that on the date of this filing a copy of the foregoing was served via electronic case filing and all parties of record were served by that system.

/s/Eric J. Menhart*

Eric Menhart, Esq.